

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN,

Plaintiff,

-against-

THE CITY OF NEW YORK ET AL.,

Defendant.

**DECLARATION OF MARY JANE
ANDERSON IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
THE COMPLAINT PURSUANT TO
RULE 12(B)(6)**

23 Civ. 9648 (JGLC) (GWG)

Mary Jane Anderson, an attorney duly admitted to practice in United States District Court for the Southern District of New York, declares pursuant to 28 U.S.C. 1746, under penalty of perjury, as follows:

1. I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants the City of New York, Ebrahim, Castro, Caruso, and Garcia.

2. I submit this declaration in support of Defendants' Motion to Dismiss the Complaint Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. I am familiar with the facts and circumstances stated herein based upon personal knowledge, the records of the City of New York, and conversations with its agents and employees.

3. Annexed hereto as **Exhibit “A”** is video footage of the incident that Plaintiff sent to the undersigned on February 27, 2024.

New York, New York
March 26, 2024

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
Attorney for defendants
100 Church Street
New York, New York 10007
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By: *Mary Jane Anderson* /s/
Mary Jane Anderson
Assistant Corporation Counsel
Special Federal Litigation Division

Jason Goodman v. City of New York et al., 23 Civ. 9648 (JGLC) (GWG)

City Defendants' Exhibit A

Video Footage of the November 1, 2022 Incident